**GARY PIERCE** 

**BOB STUMP** 

PAUL NEWMAN

SANDRA D. KENNEDY

KRISTIN K. MAYES, Chairman

## **NEW APPLICATION**



RECEIVED

Arizona Corporation Commission

BEFORE THE ARIZONA CORPORATION COMMISS

MAY 2 0 2009

**COMMISSIONERS** 

3

1

2

4

5

6 7

8

9

10

11

12

14

13

15

16 17

18

19

20 21

22 23

24

25 26

DOCKETED BY

E-01345A-09-0255

IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY FOR APPROVAL OF TRANSMISSION ADJUSTOR CHARGES.

DOCKET NO. E-01345A-09-

APPLICATION

### I. INTRODUCTION

Pursuant to Decision No. 67744 (April 7, 2005), Arizona Public Service Company ("APS" or "Company") hereby requests that the Commission approve Revision No. 3 to Adjustment Schedule TCA-1 ("TCA-1"), effective July 1, 2009. See Attachment A. TCA-1 reflects the transmission rates authorized by the Federal Energy Regulatory Commission ("FERC") that will become effective for users of the APS transmission system as of June 1, 2009. A red-lined version of TCA-1 is also included with this Application as Attachment B.

### II. BASIS FOR THE COMPANY'S REQUEST

In Decision No. 67744, the Commission approved a transmission cost rate adjustment mechanism, or TCA. See Attachment C. The initial TCA charge was set at \$0.00/kWh, with base electric rates reflecting an effective transmission charge of \$.00476 per kWh. Under the terms of Decision No. 67744, "[T]he TCA goes into effect when the transmission component of retail rates exceeds the test year base amount of \$.00476 per kWh by 5 percent and APS obtains Commission approval of a [new] TCA rate. See Decision No. 67744 at page 28. Because FERC establishes

 unbundled transmission rates for all users of the APS transmission system, the purpose of the TCA was to permit more timely recovery by APS of transmission costs from all customers. The Commission further stated that the TCA would "ensure that any potential direct access customers pay the same for transmission as Standard Offer Customers." *Id*.

In Decision No. 69663 (June 28, 2007), the Commission changed the structure of APS's unbundled transmission charges and the TCA to mirror the Company's Open Access Transmission Tariff ("OATT") as approved by FERC. Specifically, the previous uniform per kWh charge was converted to a per kW charge for customers having demands greater than 20 kW and having demand meters while remaining as a per kWh charge for smaller customers (including residential customers) or customers that are not metered for demand.

In Decision No. 70179 (February 27, 2008), the Commission approved the first implementation of the TCA in response to higher FERC-authorized transmission rates that became effective March 1, 2008 (although filed in June of 2007). That Decision specifically found that the 5 percent "trigger" referenced in Decision No. 67744 had been met.

In Decision No. 70400 (July 3, 2008), the Commission approved a second revision to the TCA effective as of the date of the order. This currently approved TCA-1 Rate Schedule is attached hereto as Attachment D.

### III. IMPACT OF THE PROPOSED TCA CHARGES

The impact on retail revenues from the new TCA charges is approximately \$21 million per year. For a typical APS residential customer, this means an increase of roughly \$1.23 per month. An analysis of typical customer bill impact is shown on Attachment E. The TCA charges also reflect any credits due to customers as a result of the previous year's review period of the FERC formula rate method and refunds of amounts collected from March 1, 2008 through June 30, 2008 prior to FERC Settlement rates being approved.

12

13

14

15

16

17

18

19

20

21

In addition, the review of the forecast presented in last year's FERC filing, performed by Staff and its consultant, identified adjustments to be made to certain rate-based items (approximately \$16 million) and also to certain income statement items (approximately \$8 million). In total, these adjustments had the effect of lowering the calculated 2008 revenue requirement by some \$10 million. The dollar impact of such adjustments will vary from year to year, but the Company did incorporate these same adjustments into the 2009 Annual Update submitted to FERC on May 15, 2009, as well into the present filing, resulting in a lower increase to APS customers (approximately \$6 million) in this rate proceeding, or \$0.28 per month for a typical APS residential customer.

When reviewing Attachment E, it is important to bear in mind that the FERC cost allocation method assigns transmission costs based on customer class load during the four summer peak months. For that reason, the allocation of revenue requirement responsibility for transmission costs may vary from year to year, depending upon what class produced the greatest load relative to other classes of retail customers. In 2008, the residential customer class contributed more load to the summer peaks than in prior years, and its revenue requirement responsibility increased accordingly. And, although the peak contribution of residential customers increased relative to other classes, the 2008 residential energy sales were lower than in previous years.<sup>2</sup> This also resulted in additional upward rate pressure for the residential class because the increased revenue requirement was spread over a lower sales volume. As noted above, such relatively small swings in revenue requirement responsibility from one year to the next are to be expected, and they could just as easily produce the opposite result in future years.

22

23

24

26

retail demand.

<sup>&</sup>lt;sup>1</sup> In 2007, residential customers were 52.45% of total retail summer demand, while the commercial and industrial customer classes were 41.29% and 6.26%, respectively. In 2008, residential customers comprised 53.02% of total 25

<sup>&</sup>lt;sup>2</sup> Residential energy consumption fell 2.7% from 2007 to 2008.

### IV. CONCLUSION

APS is requesting the rates become effective on July 1, 2009. Although the rates posted by APS on OASIS on May 15, 2009 are to become effective June 1<sup>st</sup>, APS recognizes that it would not be realistic to expect the Commission can approve this TCA application in time to become effective concurrent with the change in the OATT.

APS believes the requested TCA charges are fully consistent with the terms of Decision Nos. 67744, 69663, 70179 and 70400. APS therefore requests that the Commission approve TCA-1, attached hereto as Attachment A, effective for all bills issued beginning in the first billing cycle of July, 2009.

RESPECTFULLY SUBMITTED this 20th day of May, 2009.

Thomas L. Mumaw Meghan H. Grabel

Attorneys for Arizona Public Service Company

The original and 13 copies of the foregoing were filed this 20th day of May 2009 with:

Docket Control

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

19

20

Arizona Corporation Commission

18 | 1200 West Washington

Phoenix, AZ 85007.

And copies of the foregoing were hand-delivered or e-mailed to:

21 Kristin K. Mayes, Chairman

Gary Pierce, Commissioner

22 Paul Newman, Commissioner

Sandra K. Kennedy, Commissioner

23 Bob Stump, Commissioner

Mike Kearns

Ernest Johnson

25 Terri Ford

Barbara Keene

26 Steve Irvine

## Attachment A



### ADJUSTMENT SCHEDULE TCA-1 TRANSMISSION COST ADJUSTMENT

### APPLICATION

The Transmission Cost Adjustment ("TCA") charge shall apply to all Standard Offer retail electric schedules, with the exception of solar rates Solar-1, Solar-2, and SP-1. All provisions of the customer's current applicable rate schedule will apply in addition to this charge.

### ANNUAL ADJUSTMENT

Standard Offer rate schedules covered by this charge include a transmission component of base rates that was originally established at \$0.00476 per kilowatt-hour in accordance with A.C.C. Decision No. 67744. Decision No. 67744 also established the TCA. Decision No. 69663 modified the collection of transmission costs in retail rates to tie to the costs found in the FERC approved Open Access Transmission Tariff.

### RATE

The charge shall be applied as follows:

Customer Class	TCA Charge
Residential	\$0.002258/kWh
General Service 20 kW or less	\$0.001889/kWh
General Service over 20 kW, under 3,000 kW	\$0.902/kW
General Service 3,000 kW and over	\$0.225/kW

## Attachment B



### ADJUSTMENT SCHEDULE TCA-1 TRANSMISSION COST ADJUSTMENT

### APPLICATION

The Transmission Cost Adjustment ("TCA") charge shall apply to all Standard Offer retail electric schedules, with the exception of solar rates Solar-1, Solar-2, and SP-1. All provisions of the customer's current applicable rate schedule will apply in addition to this charge.

### **ANNUAL ADJUSTMENT**

Standard Offer rate schedules covered by this charge include a transmission component of base rates that was originally established at \$0.00476 per kilowatt-hour in accordance with A.C.C. Decision No. 67744. Decision No. 67744 also established the TCA. Decision No. 69663 modified the collection of transmission costs in retail rates to tie to the costs found in the FERC approved Open Access Transmission Tariff.

### **RATE**

The charge shall be applied as follows:

Customer Class	TCA Charge
Residential	\$0.001210.002258/kW
,	h
General Service 20 kW or less	\$0 <del>.001220</del> .001889/kW
	h
General Service over 20 kW, under 3,000 kW	\$0 <del>.638</del> .902/kW
General Service 3,000 kW and over	\$0 <del>.346</del> .225/kW

## Attachment C

1 2

3

5

6 7

8

9

10 11

12

13 14

15

16 17

19 20

21

22

24

23

25

26

27 28

agencies to determine the efficiency and practicality of such a streamlined approach.

The Commission believes that APS should work to make its low-income assistance programs widely available, including to Native Americans living inside the Company's service territory. Within six months of the effective date of this Order, APS shall develop an outreach plan that will enable it to better inform the state's Tribes about the Company's low-income assistance programs. The plan should be filed with the Commission and made available to Tribal authorities within APS' service territory.

### Returning Customer Direct Access Charge ("RCDAC")

The Settlement Agreement provides that APS can recover from Direct Access customers the additional cost that would otherwise be imposed on other Standard Offer customers if and when the former return to Standard Offer from their competitive suppliers. The RCDAC shall not last longer than 12 months for any individual customer. The charge will apply only to individual customers or aggregated groups of 3 MW or greater who do not provide APS with one year's advance notice of intent to return to Standard Offer service. APS will file a Plan of Administration as part of its tariff compliance filing.

### Service Schedule Changes

The Settlement Agreement adopts several of APS' proposed changes to service schedules, including Schedule 3, but with the retention of the 1,000 foot construction allowance for individual residential customers and also with any individual residential advances of costs being refundable. Several APS customers made public comment about the line extension policy and how it has not been modified in a long time. We will direct Staff to work with APS to review its line extension policy and determine whether the construction allowance should be modified.

### p. Nuclear Decommissioning

The decommissioning costs as recommended by APS are adopted as set forth in Appendix I to the Settlement Agreement.

### Transmission Cost Adjustor ("TCA")

The Settlement Agreement establishes a transmission cost adjustor ("TCA") to ensure that any potential direct access customers pay the same for transmission as Standard Offer customers.

1 retail rates exceeds the test year base amount of \$0.00476<sup>36</sup> per kWh by 5 percent and APS obtains 3 4

Commission approval of a TCA rate.

Distributed Generation

6

5

11

12

10

13

14

15

17 18

19

20

21 22 23

25

26 27

28

Generally, distributed generation is small-scale power generation units strategically located near customers and load centers. According to the ACA/DEAA, the benefits of distributed energy systems include: greater grid reliability; increased grid stability (voltage support along transmission lines); increased system efficiency (reduction in transmission line losses); increased efficiency; flexibility; decreased pressure on natural gas (demand and cost); leverage of resources; and sustainable installations.

The TCA is limited to recovery of costs associated with changes in APS' open access transmission

tariff ("OATT") or equivalent tariff. The TCA goes into effect when the transmission component of

The Settlement Agreement provides that Staff shall schedule workshops to consider outstanding issues affecting distributed generation and shall refer to the results of the prior distributed generation workshops for issues to study.

ACA/DEAA presented its objectives at hearing as follows: a DG workshop with strong Staff leadership; clear goals, ground rules, milestones, and deadlines; participants with authority; continuing reports to ACC and management; and a process to bring contested issues to the Commission for resolution. None of the proponents of the Settlement Agreement oppose Commission adoption of these objectives.

In its post-hearing brief, ACA/DEAA listed the following guidelines as "overriding criteria": 1) rates must be fair; 2) rates should be designed to send as efficient as possible pricing signals to consumers; 3) impediments to customer choices, such as unnecessarily difficult and expensive interconnection to the grid, should be eliminated to the maximum extent possible; 4) all generators should be treated fairly - large and small; and 5) proposals, if implemented, should not interfere with the Commission's public policy goals. ACA/DEAA made 3 recommendations: 1) Rate Design - the Commission should adopt an experimental rate for partial requirement customers. The proposal

<sup>&</sup>lt;sup>36</sup> Paragraph 106 of the Settlement Agreement contains a typo; the amount "\$0.000476" should actually be "\$0.00476," Tr. p. 1168.

### XV. Nuclear Decommissioning

103. Decommissioning costs shall be as proposed in APS' direct testimony. Attached as Appendix I is the level of decommissioning costs authorized and included in APS' total settlement test year revenue requirement.

### XVI. Transmission Cost Adjustor

- 104. A transmission cost adjustor ("TCA") shall be established in order to ensure that any potential direct access customers will pay the same for transmission as standard offer customers. The TCA shall be limited to recovery (refund) of costs associated with changes in APS' open access transmission tariff ("OATT") or the tariff of an RTO or similar organization.
- 105. Whenever APS files an application with FERC to change its transmission rates, it shall file a notice with the Commission of its application. APS shall at the same time also provide a copy of its application to the Director of the Utilities Division.
- 106. The TCA shall not take effect until the transmission component of retail rates exceeds the test year base of \$0.000476 per kWh by five percent. When this trigger amount is reached, APS may file for Commission approval of a TCA rate.
- 107. As part of the tariff compliance filing set forth in Paragraph 135, APS shall file a plan of administration that describes how the TCA shall operate.

### XVII. Distributed Generation

- 108. Commission Staff shall schedule workshops to consider outstanding issues affecting distributed generation. Staff shall refer to the results of prior distributed generation workshops when determining the specific issues that will benefit from further study.
  - 109. If necessary, the workshops may be followed with rulemaking.

### XVIII. Bark Beetle Remediation

- 110. APS is authorized to defer for later recovery the reasonable and prudent direct costs of bark beetle remediation that exceed test year levels of tree and brush control. The deferral account established for this purpose shall not accrue interest.
- III. In the Company's next general rate proceeding, the Commission will determine the reasonableness, the prudence, and the appropriate allocation between distribution and transmission of these costs. The Commission will also determine an appropriate amortization period for the approved costs.

## Attachment D



### ADJUSTMENT SCHEDULE TCA-1 TRANSMISSION COST ADJUSTMENT

### **APPLICATION**

The Transmission Cost Adjustment ("TCA") charge shall apply to all Standard Offer retail electric schedules, with the exception of solar rates Solar-1, Solar-2, and SP-1. All provisions of the customer's current applicable rate schedule will apply in addition to this charge.

### **ANNUAL ADJUSTMENT**

Standard Offer rate schedules covered by this charge include a transmission component of base rates that was originally established at \$0.00476 per kilowatt-hour in accordance with A.C.C. Decision No. 67744. Decision No. 67744 also established the TCA. Decision No. 69663 modified the collection of transmission costs in retail rates to tie to the costs found in the FERC approved Open Access Transmission Tariff.

### **RATE**

The charge shall be applied as follows:

Customer Class	TCA Charge
Residential	\$0.001210/kWh
General Service 20 kW or less	\$0.001220/kWh
General Service over 20 kW, under 3,000 kW	\$0.638/kW
General Service 3,000 kW and over	\$0.346/kW

## Attachment E

	Current Rates	Æ	Proposed Rates		Current Rates	P. S.	Proposed Rates	ű.	<b>Current</b> Rates	Propose Rates	Proposed Rates
	Annual Average Monthfy	- 4 2	Annuał Average Monthly	ø≥	Summer Monthly	S. S.	Summer Monthly	SŠ	Winter Monthly	Mo Mo	Winter Monthly
Residential (Average - All Rates)	BM (1)		<b>8</b>		Bill		<b>3</b> 1		BIII	8	<b>=</b>
Average kWh per Month	1.16	92	1,169		1,408		1,408		930		930
Base Rates	\$ 116.20	& ₩	116.20	<del>69)</del>	150.41	44	150.41	↔	81.99	\$	81.99
PSA- Forward Component	,	Ż.	5.94		7.15		7.15		4.72		4.72
PSA - Historical Component	Ö	ç	0:30		0.36		0.36		0.24		0.24
Interim Rate Adjustor (January 2009)	2.64	¥	2.64		3.18		3.18		2.10		2.10
CRCC (April 2005)	ö	요	0.40		0.48		0.48		0.31		0.31
EIS (July 2007)	ò	Ð	0.19		0.23		0.23		0.15		0.15
RES (Jan 1, 2009)	'n	_	3.17		3.17		3.17		3.17		3.17
DSMAC (April 2009)	.0	<u>.</u>	0.71		0.85		0.85		0.56		0.56
TCA (May, 2009)	-	2	2.64		1.70		3.18		1.13		2.10
Total	\$ 130,97	\$ 25	132.19	₩>	167.53		169.01	<del>€9</del>	94.37	€	95.34
Bill Impact		<u>م</u>	1.22			မှ	1.48			₩	76'0
Percent Bill Impact			0.83%								

	Current Rates	s s	Proposed Rates		Surrent Rates	P	Proposed Rates		Current Rates	Proposed Rates
	Annual Average Monthly	ıal ige hiv	Annual Average Monthiv	s ≥	Summer Monthly	ៃស≊	Summer		Winter Monthly	Winter
Residential (Rate ET-1)	Bill (1	` <del>-</del>	Bill		Bill		Bill		Bill	Bill
Average kWh per Month		1,522	1,522		1,917		1,917		1,127	1,127
\$ BSC *		14.79 \$	14.79	<del>69</del>	14.79	<del>67)</del>	14.79	₩	14.79 \$	14.79
On-Peak kWh Charge		80.67	80.67		114.87		114.87		46.47	46.47
Off-Peak kWh Charge		49.26	49.26		60.83		60.83		37.69	37.69
Sub-Total Base Rates	•	144.72 \$	144.72	↔	190.49	<del>63</del>	190.49	G	98.95 \$	98.95
PSA - Forward Component		7.74	7.74		9.74		9.74		5.73	5.73
PSA - Historical Component		0.39	0.39		0.49		0.49		0.29	0.29
Interim Rate Adjustor (January 2009)		3.44	3.44		4.33		4.33		2.55	2.55
CRCC (April 2005)		0.52	0.52		0.65		0.65		0.38	0.38
EIS (July 2007)		0.25	0.25		0.31		0.31		0.18	0.18
RES (January 1, 2009)		3.17	3.17		3.17		3.17		3.17	3.17
DSIMAC (April 2009)		0.92	0.92		1.16		1.16		0.68	0.68
TCA (May, 2009)		1.84	3.44		2.32		4.33		1.36	2.54
Total (Base Rates plus Adjustments)		162.99 \$	164.59	↔	212.66	<del>69</del>	214.67	<del>69</del>	113.29 \$	114.47
Bill Impact		<del>49</del>	1.60			<del>69</del>	2.01		€Э	1.18
Percent Bill Impact			%96.0							

		Current Rates	Prop Ra	Proposed Rates	0	Current Rates	4	Proposed Rates		Current Rates	Proposed Rates	ō
		Annual	An.	Annual	•		•					
G.S. (Rate E-32 > 20kW)	_	Average Monthly	Ave	Average Monthly	o≥	Summer Monthl∨	os≥	Summer Monthly		Winter Monthly	Winter	. >
Secondary Voltage and Instrument-Rated Meter		Bill (1)	Δ.	Bill		Bill	1	Bill		⊞8	蓋	_
Average kWh per Month		8,364		8,364		9,271		9,271		7,456	_	7,456
BSC	↔	34.02	↔	34.02	↔	34.02	↔	34.02	↔	34.02 \$	e	34.02
Demand Charge		203.45		203.45		220.40		220.40		186.49	18	186.49
Energy Charge		519.03		519.03		630.20		630.20		407.86	5	17.86
Sub-Total Base Rates	ω	756.50	s	756.50	<del>69</del>	884.62	49	884.62	<del>(A</del>	628.37 \$	62	628.37
PSA - Forward Component		42.49		42.49		47.10		47.10		37.88	m	7.88
PSA - Historical Component		2.16		2.16		2.39		2.39		1.92		1.92
Interim Rate Adjustor (January 2009)		18.90		18.90		20.95		20.95		16.85	_	6.85
CRCC (April 2005)		2.83		2.83		3.13		3.13		2.52		2.52
EIS (July 2007)		 		1.34		1.48		1.48		1.19		1.19
RES (January 1, 2009)		66.38		66.38		73.58		73.58		59.18	LO.	59.18
DSMAC (April 2009)		8.10		8.10		8.71		8.71		7.49		7.49
TCA (May, 2009)		18.90		26.73		20.33		28.74		17.47	7	24.71
Total (Base Rates plus Adjustments)	₩	917.58	69	925.41	<del>69</del>	1,062.29	<del>69</del>	1,070.70	↔	772.87 \$	78	780.11
Bill Impact			*	7.83				8.41				7.24
Percent Bill Impact				0.85%								

	0 -	Current Rates	Proposed Rates		Current Rates	•	Proposed Rates		Current Rates	4	Proposed Rates
G.S. (Rate E-34 High Load Factor) Secondary Voltage and Instrument-Rated Meter	∢ ≥ ⊠	Average Monthly Bill (1)(2)	Average Monthly Bill		Summer Monthly Bill		Summer Monthly Bill		Winter Monthly Bill		Winter Monthly Bill
Average kWh per Month		2,622,416	2,622,416	 	2,806,239		2,806,239		2,438,592		2,438,592
BSC	ь	34.02 \$	34.02	<del>69</del>	34.02	69	34.02	€9	34.02	€9	34.02
Demand Charge		74,958	74,958		81,155.17		81,155.17		68,760.02		68,760.02
Energy Charge		97,422.74	97,422.74		104,251.78		104,251.78		90,593.69		90,593.69
Sub-Total Base Rates	₩	72,414.35 \$	172,414.35	€	185,440.97	₩	185,440.97	₩	159,387.73	₩	159,387.73
PSA - Forward Component		13,321.87	13,321.87		14,255.69		14,255.69		12,388.05		12,388.05
PSA - Historical Component		676.59	676.59	_	724.01		724.01		629.16		629.16
Interim Rate Adjustor (January 2009)		5,926.66	5,926,66		6,342.10		6,342.10		5,511.22		5,511.22
CRCC (April 2005)		886.38	886.38		948.51		948.51		824.24		824.24
EIS (July 2007)		419.59	419.59	_	449.00		449.00		390.17		390.17
RES (January 1, 2009)		353.78	353.78		353.78		353.78		353.78		353.78
DSMAC (April 2009)		1,339.35	1,339.35		1,450.08		1,450.08		1,228.62		1,228.62
TCA (May, 2009)		1,695.46	1,102.54	_	1,835.63		1,193.69		1,555.28		1,011.38
Total (Base Rates plus Adjustments)	8	197,034.03 \$	196,441.11	₩	211,799.77	↔	211,157.83	₩	182,268.25	₩.	181,724.35
Bill Impact		4	(592.92)	<b>€</b>		₩	(641.94)			↔	(543.90)
Percent Bill Impact			-0.30%	9							

	Current Rates	Proposed Rates		Current Rates	Proposed Rates		Current Rates	Proposed Rates	<b>P</b>
	Average	Average	υ,	Summer	Summer		Winter	Winter	<u>.</u>
G.S. (Rate E-35 High Load Factor)	Monthly	Monthly	_	Monthly	Monthly		Monthly	Monthly	<u>~</u>
Secondary Voltage and Instrument-Rated Meter	Bill (1)(2)	Bill		Bill	Bill		Bill	Bill	
Average kWh per Month	3,643,316	3,643,316		3,884,267	3,884,267		3,402,365	3,40;	3,402,365
BSC	\$ 34.02	34.02	↔	34.02	\$ 34.02	↔	34.02		34.02
On-Peak Demand Charge	130,833.51	130,833.51		130,347.58	130,347.58		131,319.43	131,319.43	19.43
Off-Peak Demand Charge	25,061.89	25,061.89		25,678.15	25,678.15		24,445.62	24,4	24,445.62
On-Peak kWh Charge	408,369.95	408,369.95		423,078.43	423,078.43		393,661.47	393,661.47	61.47
Off-Peak kWh Charge	729,601.81	729,601.81		765,439.60	765,439.60		693,764.01	693,764.01	64.01
Sub-Total Base Rates	\$ 1,293,901.17	1,293,901.17	₩	,344,577.78	\$ 1,344,577.78	↔	1,243,224.55	1,243,224.55	24.55
PSA - Forward Component	18,508.05	18,508.05		19,732.08	19,732.08		17,284.01	17,28	17,284.01
PSA - Historical Component	939.98	939.98		1,002.14	1,002.14		877.81	80	877.81
Interim Rate Adjustor (January 2009)	8,233.89	8,233.89		8,778.44	8,778.44		7,689.34	7,6	7,689.34
CRCC (April 2005)	1,231.44	1,231.44		1,312.88	1,312.88		1,150.00	1,1	150.00
EIS (July 2007)	582.93	582.93		621.48	621.48		544.38	Ų	544.38
RES (January 1, 2009)	353.78	353.78		353.78	353.78		353.78	ਲ	353.78
DSMAC (April 2009)	2,354.55	2,354.55		2,465.63	2,465.63		2,243.46	2,2	2,243.46
TCA (May, 2009)	2,354.55	1,531.14		2,465.63	1,603.37		2,243.46	1,4	1,458.90
Total (Base Rates plus Adjustments)	\$ 1,328,460.34 \$	1,327,636.93	\$	1,381,309.84	\$ 1,380,447.58	↔	1,275,610.79	1,274,826.23	26.23
Bill Impact	•	(823.41)			\$ (862.26)		•	Ē.	(784.56)
Percent Bill Impact		<b>~90.0</b> -							

Note: (1) Bill excludes regulatory assessment charge, taxes and fees. Adjustor levels and interim base rate surcharge in effect as of May 1, 2009. (2) Used Load Research COSS data for on-peak and off-peak percentages.

# Median kWh

		Current Rates	g S. S.	Proposed Rates	υ –	Current Rates	4	roposed Rates		Current Rates	P.O.	Proposed Rates
		Average Monthly	₹ § §	Average Monthly	ਲΣ	Summer Monthly	ω≥	Summer Monthly		Winter Monthly	ΣΣ	Winter Monthly
Residential (Rate E-12)		BIII (1)	ш	<b></b>		Bill		Bill		Bill		Bill
Median kWh per Month		285		582		964		664		499		499
Basic Service Charde	649	7,59	en.	7.59	₩	7.59	<del>69</del>	7.59	↔	7.59	<del>6/3</del>	7.59
First 400 kWh		37,92		37.92		34.28		34.28		41.55		<b>4</b> .55
Next 400 KWh		32.14		32.14		32.14		32.14				
All additional kVVh												
Sub-Total Base Rates	<del>69</del>	61.58	<del>\$</del>	61.58	↔	74.01	<del>())</del>	74.01	₩	49.14	₩.	49.14
PSA - Forward Component		2.95		2.95		3.37		3.37		2.53		2.53
PSA - Historical Component		0.15		0.15		0.17		0.17		0.13		0.13
Interim Rate Adjustor (January 2009)		1.32		1.32		1.50		1,50		1,13		1.13
CRCC (April 2005)		0.20		0.20		0.22		0.22		0.17		0.17
EIS (July 2007)		0.10		0.10		0.11		0.11		0.08		0.08
RES (January 1, 2009)		3.17		3.17		3.17		3.17		3,17		3.17
DSMAC (April 2009)		0,35		0.35		0.40		0.40		0.30		0.30
TCA (May, 2009)		0.70		1.32		0.80		1.50		0.60		1.13
Total (Base Rates blus Adiustments)	<del>69</del>	70.52	es.	71.14	49	83,75	€>	84.45	€9	57.25	↔	57.78
Sill Impact	•		₩	0.62			<del>(A)</del>	0.70			us.	0.53
Percent Bill Impact				0.88%								

		Annual	_	Annual								
		Average	٩	verage	ิ	ımmer	Sumr	ner	>	Anter	\$	linter
		Monthly	_	Monthly	Z	Monthly	Monthly	hy.	Σ	Monthly	ž	Monthly
Residential (Rate ET-1)		BIII (1)		Bill		Bill						211
Marian 146 to mar Randa		1 332		1.332		1,702		1,702		961		961
	65	14 79	<del>G</del> P.	14.79	49	14.79	<del>63</del>	14.79	↔	14.79	₩	14.79
	•	70.80	•	70.80		101.98	,	101.98		39.62		39.62
		43.08		43.08		54.01		54.01		32.14		32.14
On-reak Kvvn Charge	<del>G</del>	128 67	69	128.67	બ	170.78	49	170.78	49	86.55	cs)	86.55
Sub-lotal base rates	•	228	•	6 77		8.65		8.65		4.88		4.88
PoA - Forward Component		0.35		0.35		4.0		0.44		0.25		0.25
PoA - Historical Component		301		3.01		3.85		3,85		2.17		2.17
Interim Rate Adjustor (January 2009)		0.45		0.45		0.58		0.58		0.32		0.32
CRCC (April 2003)		0.21		0.21		0.27		0.27		0.15		0.15
Els (July 2007)		3.17		3.17		3.17		3.17		3.17		3.17
NEW (January 1, 2009)		0.81		0.81		1,03		1.03		0.58		0.58
TOWAC (April 2008)		1.61		3.01		2.06		3.84		1.18		2.17
Total (Boon Dates alse Adjustments)	4	145.05	မှာ	146.45	₩,	190.83	€9-	192.61	↔	99.23	₩	100.24
Bill Impact	•		*	1.40			<del>69</del>	1.78			₩	1.01
Percent Bill Impact				0.96%								